

### Remarks

Applicant has amended the claims in response to the Office Action of 21 November 2005 and to more clearly define the present invention. In particular, the applicant has amended claims 1, 8, 14, and 18 to include the limitation that the trap is a gas phase reaction trap. This amendment is supported throughout the specification, particularly at page 9, line 11 thru page 10, line 4. All of the claims have been amended to provide more clear language.

The Examiner has rejected claims 1, 3, 4, 8, 10, 11, 14-19, 21 and 22 under 35 USC 103(a) as being unpatentable over Vaartstra in view of Visser. In particular, the Examiner finds that Vaartstra teaches a chemical vapor layer deposition apparatus similar to that being presently claimed, but notes that Vaartstra fails to teach a trap connected to the reaction chamber. The Examiner then relies on Visser for teaching a trap and concludes that it would have been obvious to one skilled in the art to combine Vaartstra and Visser to arrive at the present invention.

These rejections are respectfully traversed and it is respectfully submitted that the present invention is patentable distinct from the references cited, particularly as now set forth in the amended claims.

As noted above, all of the independent claims have been amended to specifically state that the trap is a gas phase reaction trap. As noted, Vaartstra fails to teach a trap whatsoever. Further, the trap of Visser is a condensation trap used to remove a condensable gas from a gas stream.

Clearly, neither Vaartstra nor Visser teach the present invention that utilizes a gas phase reaction trap to promote gas phase reactions between precursor gases and eliminate such before reaching a process pump.

Therefore, it is respectfully submitted that the present invention is patentably distinct from Vaartstra in view of Visser and it is respectfully requested that the rejection of claims 1, 3, 4, 8, 10, 11, 14-19, 21 and 22 under 35 USC 103(a) as being unpatentable over such references be withdrawn

The Examiner also rejects claims 2, 5, 9, 12, 20 and 23 under 35 USC 103(a) as being unpatentable over Vaartstra and Visser as applied above and further in view of Desbiolles. In particular, the Examiner relies on Desbiolles to overcome the recognized deficiencies of the Vaartstra and Visser, i.e. failure to teach an apparatus wherein the inlet and outlet of the trap are at that top of the trap. These rejections are respectfully traversed and it is respectfully submitted that the present invention is patentably distinct from the combination of Vaartstra, Visser and Desbiolles.

As noted above, Vaartstra and Visser fail to teach or suggest the present invention wherein a gas phase reaction trap is used. Desbiolles does not overcome this deficiency. Therefore, it is clear that the present invention is patentably distinct from the suggested combination.

In this light, it is respectfully requested that the rejection of claims 2, 5, 9, 12, 20 and 23 under 35 USC 103(a) be withdrawn.

The Examiner has further rejected claims 6, 13 and 14 under 35 USC 103(a) as being unpatentable over Vaartstra and Visser for the reasons above and further in view of Mariella. In particular, the Examiner relies on Mariella for the teaching of an electrode and ground connection to a trap, which is admittedly not found in

Vaartstra and Visser. These rejections are respectfully traversed and it is respectfully submitted that the present invention is patentably distinct from the combination of Vaartstra, Visser and Mariella.

As noted above, Vaartstra and Visser fail to teach or suggest the present invention wherein a gas phase reaction trap is used. Mariella does not overcome this deficiency. Therefore, it is clear that the present invention is patentably distinct from the suggested combination.

In this light, it is respectfully requested that the rejection of claims 6, 13 and 14 under 35 USC 103(a) be withdrawn.

The Examiner has additionally rejected claims 7 and 25 under 35 USC 103(a) as being unpatentable over Vaartstra and Visser for the reasons above and further in view of Robles. The Examiner relies on Robles to show the use of a surge flow suppresser that is not found in either Vaartstra or Visser. These rejections are respectfully traversed and it is respectfully submitted that the present invention is patentably distinct from the combination of Vaartstra, Visser and Robles.

Vaartstra and Visser fail to teach or suggest the present invention wherein a gas phase reaction trap is used. Robles does not overcome this deficiency. Therefore, it is clear that the present invention is patentably distinct from the suggested combination.

In this light, it is respectfully requested that the rejection of claims 7 and 25 under 35 USC 103(a) be withdrawn.

In light of the above amendments and remarks, it is respectfully submitted that the all of the rejections raised by the Examiner in the Office Action of 21 November 2005 have been overcome and it is respectfully submitted that the

present application is in condition for allowance. Further action consistent therewith is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "DAVID A. HEY".

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